

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

BLENDTEC INC., a Utah Corporation

Plaintiff,

v.

**BLENDJET INC., a Delaware corporation,
MAVORCO HOLDINGS, LLC, a
Delaware limited liability company,
MAVORCO IP, LLC, a Delaware limited
liability company, and MAVORCO
OPERATIONS, LLC, Delaware limited
liability company,**

Defendants.

DECLARATION OF
RYAN PAMPLIN

Civil No. 2:25-cv-00096-RJS-DBP

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead


I, Ryan Pamplin, declare as follows:

1. I am the co-founder of BlendJet Inc. (“BlendJet”), a company that was founded to design, market, and sell portable blenders. I previously served as BlendJet’s CEO from its founding in 2017 up until early 2025. Based on my role as co-founder and former CEO of BlendJet, I have personal knowledge of the facts stated in this declaration.

2. I am over the age of 18, of sound mind, and am competent to testify as to the facts contained in this declaration.

3. I submit this declaration in support of Defendants’ opposition to the motion for a preliminary injunction filed by Plaintiff Blendtec Inc. (“Blendtec”).

4. I am not an owner, officer, director, or employee of MavorCo Holding, LLC, MavorCo IP, LLC, and MavorCo Operations, LLC (“MavorCo”).

5. BlendJet first used the trademark BLENDJET in 2017, and in 2018 BlendJet introduced its first product that used the BLENDJET name and swirl logo, as shown here: .

6. BlendJet's flagship product, the BlendJet 2, has sold over 10 million units globally and has been offered in more than 40,000 retail locations.

7. BlendJet (under its prior name Miramore Inc.) applied to register the BLENDJET trademark in September of 2018.

8. The United States Patent and Trademark Office ("USPTO") issued Registration No. 5,750,510 to BlendJet on May 14, 2019, for the trademark BLENDJET in connection with "Electric food processors; Food processors, electric; Electric mixers; Electric food blenders; Electric hand-held mixers for household purposes; Hand-held electric-powered food processors."

9. BlendJet (under its prior name Miramore Inc.) applied to register its swirl design in June of 2019.

10. The USPTO issued Registration No. 5,950,040 to BlendJet on December 31, 2019, for the swirl design in connection with "Electric food processors; Electric mixers; Electric mixers for household purposes; Electric hand-held mixers for household purposes; Food processors, electric; Hand-held electric-powered food processors."

11. BlendJet has applied for and received trademark registrations for BLENDJET and its swirl design in dozens of jurisdictions worldwide. To my knowledge, no trademark office in any jurisdiction has found that BlendJet's trademarks create a likelihood of confusion with Blendtec's BLENDTEC trademark or its logo.

12. BlendJet's products are designed to meet the needs of everyday consumers seeking convenience and portability. They are battery-powered, compact, and priced between \$50 and \$70. By contrast, Blendtec's products are non-portable countertop blenders that have a minimum retail price of approximately \$400 and which then go up in price to \$2000 or more. Blendtec's blenders are marketed to commercial kitchens, including restaurants, hotels, and smoothie bars, as well as discerning home users who value powerful blenders and are willing to invest at a high price point.

13. BlendJet has never engaged in comparative advertising with Blendtec. BlendJet has never represented its products as being associated with Blendtec in any way, nor has BlendJet ever suggested that its products originate from or are endorsed by Blendtec.

14. In early 2023, BlendJet voluntarily recalled a specific subset of BlendJet 2 units. The recall ultimately impacted a larger number of units than were included in that subset because retailers were unable to determine from exterior packaging whether the units inside were part of the impacted lots. Ultimately, the number of consumer issues reported was extremely low relative to the total number of units sold.

15. The financial impact of the recall, market conditions, and expenses associated with the 2021 litigation filed by Blendtec against BlendJet, caused BlendJet to default on its financing obligations. On January 13, 2025, BlendJet's secured lender, Sandton Capital Partners

(“Sandton”), foreclosed on BlendJet’s assets and sold them to MavorCo. BlendJet did not transfer ownership or merge with MavorCo. The entities remain separate.

16. After the foreclosure, BlendJet ceased operations as an active business entity.

17. Over the years, Blendtec inquired several times about acquiring BlendJet. Blendtec wanted to pay significantly less than I believed the BlendJet business was worth.

18. Based on my experience at BlendJet, I am not aware of any instances where any sales were diverted from Blendtec to BlendJet or vice versa.

19. Based on BlendJet’s own market research, it is my understanding that the Blendtec brand is not generally familiar to BlendJet’s customers, or to blender consumers generally.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

April 25, 2025 | 5:25 PM EDT

Executed on: _____ day of _____, 2025.

Ryan Pamplin

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Ryan Pamplin